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Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DR. TIMOTHY COLLINS and SIDNEY
NAIMAN, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

TOTAL MERCHANT SERVICES, INC.,
QUALITY MERCHANT SERVICES, INC.,
MICHAEL ALIMENTO and BOBBY
POWERS

Defendants.

Case No. 4:17-cv-03806-CW

**PLAINTIFF DR. TIMOTHY COLLINS
STIPULATION OF DISMISSAL AS TO
HIS CLAIMS ONLY**

JURY TRIAL DEMAND

Complaint Filed: July 5, 2017

DATE: TBD
TIME: TBD
LOCATION: TBD

1 NOW COME the Plaintiff, Dr. Timothy Collins, and Defendant, Total Merchant
2 Services, Inc., by and through their respective counsel, and pursuant to Fed. R. Civ. P. 41(a),
3 who hereby stipulate and agree to the dismissal with prejudice of Plaintiff's individual claims
4 against Defendant and without prejudice of the putative class claims against Defendant. Each
5 party shall bear his/its own respective costs and attorneys' fees. This Stipulation for Dismissal
6 disposes of the entire action relating to Plaintiff, Dr. Timothy Collins, but has no bearing on the
7 claims of co-Plaintiff, Sidney Naiman.
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10 RESPECTFULLY SUBMITTED AND DATED this 31st day of August, 2018.

11 By: /s/ Anthony Paronich
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